

June 27, 2025

Reply to: Main Office

Mark S. Barrow (803) 256-2233 msb@swblaw.com

VIA E-MAIL: lena tapscott@scd.uscourts.gov

Hon. Richard M. Gergel District Judge c/o Lena D. Tapscott, Judicial Assistant

RE:

Steven Grinnell, et al. v. Roehl Transport, Inc. and Tovarrian Bradford Russell

Civil Action No.:

2:23-cv-6131-RMG

Our File:

3241-14533

CONFIDENTIAL ENCLOSURES FOR IN CAMERA REVIEW

Dear Judge Gergel:

Pursuant to the Court's Order of June 17, 2025 (ECF No. 55), please find enclosed for in camera review my client Roehl Transport Inc.'s ("Roehl") copy of the service agreement between Roehl and Lytx, Inc. ("Lytx"). Roehl believes the requested agreement is comprised of 1) a master purchase agreement, and 2) a master purchase agreement amendment, both of which are enclosed for the Court's review.

As noted in the status report (and exhibits) submitted contemporaneously herewith, we are also attempting to obtain the countersigned copy of the agreement from Lytx. As described in Exhibit B to the status report, Lytx maintains that this information is confidential, proprietary, and competitively sensitive. As detailed in Exhibit C to the status report, we have requested that Lytx provide their copy to us, so that we may forward to the Court for *in camera* review.

Without waiver of any other objection to discoverability or admissibility, Roehl respectfully agrees with Lytx that these documents are confidential, proprietary, and competitively sensitive. Should the Court require that some or all of these documents be produced to the other litigants, Roehl reserves the right to request a confidentiality order and the right to redact unrelated portions.

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I am transmitting a copy of this cover letter to all counsel of record via an email thread between all counsel and Ms. Tapscott. The enclosures will follow via separate email directly to Ms. Tapscott, without a copy to other counsel.

Please do not hesitate to let us know if the Court requires any further steps from us to comply with the June 17, 2025 Order.

Yours truly,

SWEENY, WINGATE & BARROW, P.A.

MSB/ajh

cc: Aaron J. Hayes, Esq. (via email)

Jake M. Tillery, Esq. (via email)

Cooper Klaasmeyer, Esq. (via email and without enclosures) Lauren Carroway, Esq. (via email and without enclosures) E. Mitchell Griffith, Esq. (via email and without enclosures)